

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

Case No. 9:24-cv-80395-RLR-BER

GREENFLIGHT VENTURE CORPORATION

Plaintiff,

v.

GOOGLE LLC,

Defendant.

PROPOSED SCHEDULING ORDER

Pursuant to the joint request of Plaintiff, GREENFLIGHT VENTURE CORPORATION (the “Plaintiff”), and Defendant GOOGLE LLC (the “Defendant”) (collectively, the “Parties”), IT IS HEREBY ORDERED that this case shall proceed along the following schedule:

1. Pursuant to Local Rule 16.1(A), this case shall be assigned to the Complex Case Management Track, with the parties expecting trial to take 10-14 days and propose the following schedule:

Event	Agreed Deadline	Plaintiff's Proposal	Defendant's Proposal
Discovery Begins		Discovery began on August 12, when a prior party correctly served discovery per completion of the 26(f) conference. At a minimum, discovery begins immediately.	Discovery opened with the conference between Greenflight and Google on August 20; Isaacs' previous <i>pro se</i> discovery is moot and Google need not respond
The Parties shall file their initial disclosure under Federal Rule of Civil Procedure 26(a)(1)		October 28, 2024	September 24, 2024
The Parties shall designate a mediator and schedule a time, date, and place for mediation	September 24, 2024		
Plaintiff shall serve preliminary infringement contentions		February 15, 2025	October 24, 2024
Any additional parties shall be added by, or amendments to the pleadings shall be made by, or motion filed by		January 7, 2025	November 7, 2024
Defendant shall serve preliminary invalidity contentions		February 22, 2025	December 19, 2024
The Parties shall exchange proposed claim terms for construction		March 1, 2025	January 9, 2025
The Parties shall exchange proposed claim constructions		March 1, 2025	January 16, 2025
Defendant shall file its opening claim construction brief		March 15, 2025	January 30, 2025

Event	Agreed Deadline	Plaintiff's Proposal	Defendant's Proposal
Plaintiff shall file its responsive claim construction brief		March 29, 2025	February 13, 2025
Defendant shall file its reply claim construction brief		April 6, 2025	February 27, 2025
Any motions for class certification shall be filed	March 6, 2025		
Any response to motions for class certification shall be filed	March 27, 2025		
A <i>Markman</i> hearing will be held		May 1, 2025	April 3, 2025
Any reply to motions for class certification shall be filed	April 10, 2025		
Fact discovery shall be completed	June 6, 2025		
Any non-expert discovery motions shall be filed	June 13, 2025		
The Parties shall identify experts and serve expert reports pursuant to Fed. R. Civ. P. 26(a)(2)(B)	June 27, 2025		
Each party shall identify rebuttal experts, and serve rebuttal expert reports for the same	July 31, 2025		
Expert discovery, including no more than one deposition per expert, absent Court order of the Parties' agreement, shall be completed	August 21, 2025		

Event	Agreed Deadline	Plaintiff's Proposal	Defendant's Proposal
Mediation shall occur by	November 20, 2025		
Dispositive motions (including summary judgment motions but excluding motions affecting the conduct of trial) may be filed at any time but shall be filed by this date. All responses to such motions shall be filed within two weeks of service of the initial motion. All replies shall be filed within seven days of service of any responses.	October 9, 2025		
Motions in limine shall be filed by this date. All responses to such motions shall be filed within two weeks of service of the initial motion. All replies shall be filed within seven days of service of any responses.			
Trial	February 16, 2026		

2. Pretrial conference and trial dates will be scheduled at the convenience of the Court; however, the Parties submit that this case will be ready for trial any time after February 16, 2026.

3. The pretrial conference shall be held on _____.

ORDERED THIS DATE:

Dated: _____

Judge Robin L. Rosenberg